

**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
**POLREP #24**

**Date:** April 17, 2003

**Subject:** Highland Drilling Oil Crude and Well Fire, Morgan County,  
TN.

**From:** Steve Spurlin, OSC,  
Region 4

**To:** S. Hitchcock, EPA  
D. Rigger, EPA  
M. Taylor, EPA  
D. Thornton, EPA HQ  
K. Rasnick, EPA  
USCG, District Eight  
NPFC, Case Officer  
Project File

**I. BACKGROUND**

SITE ID.#	Z4EZ
FPN#	EO2414
PROJECT CEILING:	\$2,200,000.00
LEAD AGENCY	EPA, Region 4, ERRB 61 Forsyth St., Atlanta
NPL:	Not in NPL
FUNDING:	OPA
LEAD OSC:	Steve Spurlin

**II. SITUATION**

Date of Notification:	7-20-02
Date Action Started:	7-21-02
Pollutant:	Crude Oil
Quantity Discharged:	500BBL
Substantial Threat:	High
Surface Water:	Clear Creek and Obed River
Source Identification:	Oil Well

### **III. ACTIONS TAKEN**

1. On January 22, OSC Spurlin conducted his first site visit after being assigned to the project. The OSC walked the site with the two USCG Strike team members who were conducting daily oversight, and representatives from Pryor oil. Also, Greg Powell, an EPA ERT Hydro geologist, and Mr. David Smink, an EPA contracted well expert were present.
2. On January 23, a meeting between EPA and Pryor oil was held in Knoxville, TN. The meeting included EPA, EPA's well consultant, Pryor oil and their consultant, and representatives from the National Park Service. The meeting was held to allow Pryor oil to provide information related to the well status to assist EPA in determining the need for a mechanical integrity test (MIT) of the well casing.
3. After the January site visit, the OSC reviewed the daily information generated by Pryor oil and the USCG related to the conditions at the well and the Clear creek boom location. For several weeks, Pryor and the USCG had observed only an intermittent sheen at the base of the bluff along the Clear creek bank. Often there was insufficient quantity of oil to even attempt collection. The EPA agreed to allow Pryor oil to modify the monitoring and collection activities from every day to once per week. EPA demobilized the USCG and made other arrangements for oversight.
4. For some time, the only observed oil and sheening has been on Clear creek at the boom located at the bottom of the bluff. Since there has been no oil/sheen observed downstream of this area for awhile, EPA allowed Pryor oil to remove the two remaining downstream booms near Barnett bridge. The National Park Service (NPS) was interested in having these booms removed so they could re-open that section of the creek. Pryor was instructed to keep the boom accessible in case the oil discharge increased necessitating the need to redeploy the booms.
5. Pryor oil continues to produce and market gas from the well. A pump jack was installed on the wellhead to facilitate oil production. According to EPA oversight contractor, very little oil is being produced.

#### **IV. FUTURE ACTIONS**

1. OSC continues to keep the NPS and TDEC aware of the project status.
2. EPA will continue to oversee Pryor oils weekly monitoring and collection actions on Clear creek.
3. EPA intends to evaluate the site conditions during the warmer summer months to see if there is an increase in oil seepage.

#### **V. COST TO DATE**

EPA	\$43,600.00
USCG	\$94,000.00
START	\$52,000.00
CMC, Inc.	\$533,000.00
Boots and Coots	\$862,000.000
PRFA w/DOI	\$100,896.95(new est. not avail.at this time)

The costs shown are based on information available at the time of this report. The figures should not be used to support or dispute any legal action regarding this site.

**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
**POLREP #25**

**Date:** July 17, 2003

**Subject:** Highland Drilling Oil Crude and Well Fire, Morgan County,  
TN.

**From:** Steve Spurlin, OSC,  
Region 4

**To:** S. Hitchcock, EPA  
D. Rigger, EPA  
M. Taylor, EPA  
D. Thornton, EPA HQ  
K. Rasnick, EPA  
USCG, District Eight  
NPFC, Case Officer  
Project File

**I. BACKGROUND**

SITE ID.#	Z4EZ
FPN#	EO2414
PROJECT CEILING:	\$2,200,000.00
LEAD AGENCY	EPA, Region 4, ERRB 61 Forsyth St., Atlanta
NPL:	Not in NPL
FUNDING:	OPA
LEAD OSC:	Steve Spurlin

**II. SITUATION**

Date of Notification:	7-20-02
Date Action Started:	7-21-02
Pollutant:	Crude Oil
Quantity Discharged:	500BBL
Substantial Threat:	High
Surface Water:	Clear Creek and Obed River
Source Identification:	Oil Well

### **III. ACTIONS TAKEN**

1. Pryor Oil Co. continues to conduct monitoring and collection activities on Clear creek pursuant to the EPA CWA Order. EPA's oversight contractor continues to met with Pryor personnel on-site once a week to document site conditions. In June and July, as summer temperatures have risen, EPA has observed larger, more frequent sheening on Clear creek. In response to the increased discharge, Pryor Oil appears to have increased their collection efforts by extending the existing fixed boom and deploying sorbent materials.
2. Efforts to negotiate a Consent Order between EPA and Pryor Oil after the January 23, 2003 meeting between EPA and Pryor Oil in Knoxville, TN were unsuccessful. The existing Order was modified by EPA to drop the mechanical integrity test (MIT) after EPA determined that the MIT was not a significant issue until the well was deepened. The modified Order continues to require Pryor Oil to conduct monitoring/collection on Clear creek and requires Pryor Oil notify EPA of their intent to deepen the well.
3. In June, EPA met with representatives from the National Park Service (NPS) and the Tennessee Department of Environment & Conservation (TDEC), Geology Division. The meeting was conducted, at the NPS request, to provide the new acting NPS Obed Unit manager an update on site status. Site restoration and repair issues were discussed. Attendees involved with the natural resource damages assessment (NRDA) inquired if EPA could determine if there was a feasible way to evaluate how long the oil seep may continue as the length and quantity of discharge could be relevant in the NRDA process. The OSC has contacted EPA's ERT-Cincinnati to discuss this issue.
5. Pryor oil is currently producing and marketing oil from the well. EPA does not know production amounts.

### **IV. FUTURE ACTIONS**

1. OSC continues to keep the NPS and TDEC aware of the project status.
2. EPA will continue to oversee Pryor Oils weekly monitoring and collection actions on Clear creek.

**V. COST TO DATE**

EPA	\$45,000.00
USCG	\$94,000.00
START	\$88,000.00
CMC, Inc.	\$538,700.00
Boots and Coots	\$862,000.00
PRFA w/DOI	\$110,000.00

The costs shown are based on information available at the time of this report. The figures should not be used to support or dispute any legal action regarding this site.

**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
**POLREP #26**

**Date:** February 27, 2004

**Subject:** Highland Drilling Oil Crude and Well Fire, Morgan County,  
TN.

**From:** Steve Spurlin, OSC,  
Region 4

**To:** S. Hitchcock, EPA  
D. Rigger, EPA  
M. Taylor, EPA  
D. Thornton, EPA HQ  
K. Rasnick, EPA  
USCG, District Eight  
NPFC, Case Officer  
Project File

**I. BACKGROUND**

SITE ID.#	Z4EZ
FPN#	EO2414
PROJECT CEILING:	\$2,200,000.00
LEAD AGENCY	EPA, Region 4, ERRB 61 Forsyth St., Atlanta
NPL:	Non CERCLA
FUNDING:	OPA
LEAD OSC:	Steve Spurlin

**II. SITUATION**

Date of Notification:	7-20-02
Date Action Started:	7-21-02
Pollutant:	Crude Oil
Quantity Discharged:	500BBL
Substantial Threat:	High
Surface Water:	Clear Creek and Obed River
Source Identification:	Oil Well

### **III. ACTIONS TAKEN**

1. Pryor Oil Co. continued to conduct monitoring and collection activities on Clear creek pursuant to the EPA CWA Order during the summer months. During this period, EPA's oversight contractor met with Pryor personnel on-site once a week to document site conditions. In June and July, as summer temperatures have risen, EPA has observed larger, more frequent sheening on Clear creek. In response to the increased discharge, Pryor Oil appears to have increased their collection efforts by extending the existing fixed boom and deploying sorbent materials.
2. Pryor Oil's lawsuit against EPA was dismissed by the court who found none of Pryor's claims to have merit.
3. In Fall 2003, EPA agreed to modify the monitoring and EPA oversight frequency of Clear Creek to once per month. This was based on a decrease in sheen amount and frequency as temperatures cooled and water levels increased with seasonal rains. At the request of EPA and the National Park Service (NPS), Pryor undertook a number of actions, in an attempt to stabilize the steep slope down to Clear creek. The original spill and fire had left the slope barren, and heavy rains had started to erode the slope soils, potentially washing oil contaminated soil into the creek. Implementing NPS recommendations, Pryor felled several trees across the slope face. The trees were secured with rebar, and hay bales and straw positioned to attempt to prevent erosion.
4. As winter began and temperatures dropped, Pryor requested EPA to allow a temporary discontinuance of monitoring due to the fact that the hill is a safety hazard to anyone traversing the steep slope. The wet, and sometimes icy slope, is slippery and dangerous to climb, especially with the straw and rebar placed on the slope. Due to the safety hazard and the fact that the sheen typically decreases in winter, EPA agreed to stop monitoring during winter months. Pryor indicated he planned to continue to check booms as weather permitted.
5. Pryor Oil Company had closed its office in Tennessee. Mr. Pryor has moved back to Kansas. He is available by cell phone.

### **IV. FUTURE ACTIONS**



1. OSC continues to keep the NPS and TDEC aware of the project status.
2. Pryor has committed to conduct additional repair and restoration actions of the area above the slope where the containment pond and rock outcrop on NPS property is located. Pryor plans to grade the area, implement erosion control measures, and attempt re-vegetate the area. NPS is aware of the proposed actions.
3. Pryor has recently requested that he be allowed to remove the booms in Clear creek. Recent storms caused trees to fall on the booms. Pryor repaired the booms, but request they be removed because they have been in the water so long and Pryor feels the booms are serving little purpose. EPA has observed that the booms do little to capture the rainbow sheening, and have really only served the purpose of a contingency in case of a larger discharge. EPA will discuss this issue with the NPS and other parties.

## **V. COST TO DATE**

EPA	\$50,000.00
USCG	\$94,000.00
START	\$88,000.00
CMC, Inc.	\$538,700.00
Boots and Coots	\$862,000.00
PRFA w/DOI	\$160,000.00

The costs shown are based on information available at the time of this report. The figures should not be used to support or dispute any legal action regarding this site.